

### **REMARKS**

In the Office Action mailed August 9, 2007, claims 1-9, 11-14, 16-20, 26-28, and 30-35 were rejected, claims 10, 15, and 29 were objected to, and claims 21-25 were allowed. All claim amendments are fully supported by the specification and drawings. No new matter is added. A Request for Continued Examination is enclosed. A Declaration Under 37 C.F.R. 1.131 is also enclosed. Claims 1-35 are pending in this application. In light of the foregoing amendments and following remarks, Applicant respectfully requests advancement of this application to allowance.

#### **Declaration Under 37 C.F.R. 1.131**

A Declaration Under 37 C.F.R. 1.131 is enclosed to swear behind the 102(e) date of the Laukkanen patent (U.S. Patent 6,934,564).

37 C.F.R. 1.131(a) states that "When a claim of an application . . . is rejected, the inventor of the subject matter of the rejected claim . . . may submit an appropriate oath or declaration to establish invention of the subject matter of the rejected claim prior to the effective date of the reference or activity on which the rejection is based . . . . The effective date of a U.S. Patent [or] U.S. patent application publication . . . is the earlier of its publication date or date that it is effective as a reference under 35 U.S.C. 102(e) . . . . Prior invention may not be established under this section before . . . January 1, 1996, in a WTO member country other than a NAFTA country."

A Declaration Under 37 C.F.R. 1.131 is enclosed with this response. The Declaration establishes invention of the subject matter of the rejected claims prior to the effective date of December 20, 2001 of the Laukkanen patent. The prior invention occurred in India, which became a member of the World Trade Organization on January 1, 1996.

37 C.F.R. 1.131(b) states that "The showing of facts shall be such, in character and weight, as to establish reduction to practice prior to the effective date of the reference, or conception of the invention prior to the effective date of the reference coupled with due diligence from prior to said date to a subsequent reduction to practice or to the filing of the application. Original exhibits or drawings or records, or photocopies

thereof, must accompany and form part of the affidavit or declaration or their absence must be satisfactorily explained.”

The Declaration includes a showing of facts that establish conception of the invention prior to December 20, 2001 coupled with due diligence from prior to December 20, 2001 to filing of the application on January 3, 2002. It is noted that this period is approximately two weeks in length. A copy of a document generated prior to December 20, 2001 is enclosed as Exhibit A as evidence of conception. The figures of Exhibit A include the claimed subject matter, as described below.

The following table shows that Exhibit A includes the subject matter of Applicant’s claims as follows:

Pending Claims	Exhibit A
1. A character input system using a keyboard comprising a plurality of keys, at least some of the keys each being assigned at least one Hindi script character, and at least one key being assigned a halant, the key assignments being spatially grouped on the keyboard according to their phonetic characteristics.	FIGS. 1 and 2 illustrate a keyboard comprising a plurality of keys. Some of the keys are assigned Hindi script characters. FIG. 2 illustrates a halant key (labeled “Halant”). The key assignments are illustrated as being spatially grouped according to their phonetic characteristics.
2. The character input system of claim 1 wherein the key assignments are also grouped according to the vowels and consonants.	FIG. 1 shows that the vowels are arranged in row 1 and the consonants are arranged in rows 2, 3, and 4.

3. The character input system of claim 2 wherein Hindi script consonants are spatially grouped according to Vargs and Non-Vargs.	FIG. 1 shows Vargs arranged along the majority of rows 2 and 3 and left half of row 4. Non-Vargs are arranged as the last two keys of row 2, last key of row 3, and last 5 keys of row 4.
4. The character input system of claim 3 wherein the keys comprising each Varg are grouped on keys that are adjacent or diagonal to one another on the keyboard.	FIG. 1 shows Vargs arranged along the majority of rows 2 and 3 and left half of row 4. Non-Vargs are arranged as the last two keys of row 2, last key of row 3, and last 5 keys of row 4. Therefore, the Vargs are grouped on keys that are adjacent or diagonal to one another on the keyboard.
5. The character input system of claim 4 wherein the keys comprising each Varg are grouped in a single row on the keyboard.	FIG. 1 including keys comprising five Vargs including Varg 1 through Varg 5. Each Varg is grouped in a single row. For example, Row 2 includes Varg 1 and Varg 4. Row 3 includes Varg 2 and Varg 5. Row 4 includes Varg 3.
6. The character input system of claim 5 wherein the keyboard comprises five Vargs of consonant keys that each contain five phonetically-related consonants.	FIG. 1 including keys comprising five Vargs including Varg 1 through Varg 5. Each Varg is grouped in a single row. For example, Row 2 includes Varg 1 and Varg 4. Row 3 includes Varg 2 and Varg 5. Row 4 includes Varg 3. As shown in FIG. 1, rows 2, 3, and 4, are all consonants.
7. The character input system of claim 6 wherein the five Varg consonant sets are assigned to keys that correspond to <b>q-w-e-r-t</b> , <b>a-s-d-f-g</b> , <b>z-x-c-v-b</b> , <b>y-u-i-o-p</b> , and <b>h-j-</b>	FIG. 1 illustrates the key layout on a standard keyboard, such that the five Varg consonant sets are assigned as stated.

<b>k-I-;</b> on a standard keyboard.	
8. The character input system of claim 1 wherein the Hindi final consonant keys are grouped together on the keyboard.	FIG. 1 illustrates the Hindi final consonant keys grouped in the region including the last two keys of row 2, last key of row 3, and last 5 keys of row 4.
9. The character input system of claim 8 wherein the Hindi final consonant keys are grouped together on a row of the keyboard.	FIG. 1 illustrates Hindi final consonant keys arranged as the last five keys of the fourth row.
10. The character input system of claim 8 wherein Hindi final consonant keys are assigned to keys that correspond to <b>n-m,-,-/</b> on a standard keyboard.	FIG. 1 illustrates Hindi final consonant keys arranged as the last five keys of the fourth row. These are the <b>n-m,-,-/</b> keys.
11. The character input system of claim 1 wherein the keyboard comprises a plurality of Hindi script vowel keys, each vowel key being assigned to a Hindi script vowel.	FIG. 1 illustrates Hindi vowel keys arranged in row 1.
12. The character input system of claim 11 wherein the Hindi vowel keys are grouped together on the keyboard.	FIG. 1 illustrates Hindi vowel keys arranged in row 1.
13. The character input system of claim 12 wherein the Hindi vowel keys are grouped on keys that are adjacent or diagonal to one another on the keyboard.	FIG. 1 illustrates Hindi vowel keys arranged in row 1. These keys are all adjacent to one another.
14. The character input system of claim 13 wherein at least some of the Hindi vowels are assigned to keys that correspond to the number-row on a standard keyboard.	FIG. 1 illustrates Hindi vowel keys arranged in row 1. These keys are the number-row on a standard keyboard.

15. The character input system of claim 14 wherein the diacritic Hindi "vowel signs" (Matras) may be accessed by pressing a modifier key with the appropriate vowel key.	The Matras are labeled in FIG. 2 and include the first row of the shifted keyboard.
16. The character input system of claim 1 wherein the keyboard is adapted for use with the Hindi language.	FIGS. 1 and 2 illustrate a keyboard adapted for use with the Hindi language.
17. The character input system of claim 1 wherein the keyboard is adapted for use with an Indian Brahmi-based script based on similarities to Hindi.	
18. The character input system of claim 1 wherein the keyboard is adapted for use with one of the group of Bengali, Telegu, Marathi, Tamil, Gujarati, Kannada, Malayalam, Oriya, Punjabi, Assamese, Manipuri and Sanskrit.	
19. The character input system of claim 1 wherein the keyboard is adapted for use with any non-Indian Brahmi-based script.	
20. The character input system of claim 1 wherein the keyboard is adapted for use with one of the group of Sinhala, Nepali, Burmese, Tibetan, Laotian, Thai, Khmer, Javanese, Bali, Batak, Bugis/Buginese and Tagalog.	
26. A computer system for use with a language that uses Brahmi-derived script, the computer system comprising:	FIG. 1 illustrates a keyboard for use with a computer system. The keyboard includes a plurality of keys. Some of the keys are

<p>a processor;</p> <p>a memory system;</p> <p>a graphical user interface; and</p> <p>a Brahmi-derived script keyboard comprising a plurality of keys, at least some of the keys each being assigned at least one Brahmi-derived script character, and at least one key being assigned a halant, the key assignments being spatially grouped on the keyboard according to phonetic characteristics of the characters.</p>	<p>assigned a Brahmi-derived script character.</p> <p>FIG. 2 illustrates a halant key (labeled "halant").</p> <p>As described above, the key assignments are spatially grouped on the keyboard according to phonetic characteristics of the characters.</p>
<p>27. The system of claim 26 wherein the keyboard comprises a virtual keyboard.</p>	
<p>28. The system of claim 26 wherein the virtual keyboard comprises a touch-sensitive screen.</p>	
<p>29. A keyboard adapted for use with Hindi script, the keyboard comprising:</p> <p>    a group of vowel keys each being assigned a Hindi script vowel, the vowel keys comprising keys corresponding to the number-row on a standard keyboard;</p> <p>    a first Varg group of phonetically-related consonant keys comprising keys corresponding to Q-W-E-R-T on a standard keyboard;</p> <p>    a second Varg group of phonetically-related consonant keys comprising keys corresponding to A-S-D-F-G on a standard keyboard;</p>	<p>FIG. 1 illustrates a keyboard. The keyboard includes vowel keys arranged along row 1, which is the number-row on a standard keyboard.</p> <p>Initial consonant keys are arranged in five subsets, including Varg 1 through Varg 5. Each Varg is grouped in a single row. For example, Row 2 includes Varg 1 and Varg 4, which correspond to Q-W-E-R-T and Y-U-I-O-P on a standard keyboard. Row 3 includes Varg 2 and Varg 5, which correspond to A-S-D-F-G and H-J-K-L-; on a standard keyboard. Row 4 includes</p>

<p>a third Varg group of phonetically-related consonant keys comprising keys corresponding to Z-X-C-V-B on a standard keyboard;</p> <p>a fourth Varg group of phonetically- related consonant keys comprising keys corresponding to Y-U-I-O-P on a standard keyboard;</p> <p>a fifth Varg group of phonetically-related consonant keys comprising keys corresponding to H-J-K-L-; on a standard keyboard; and</p> <p>a final group of Non-Varg consonant keys comprising keys corresponding to N-M,-,-/-'-[-] on a standard keyboard.</p>	<p>Varg 3, which corresponds to Z-X-C-V-B on a standard keyboard.</p> <p>Final consonants are arranged along the remaining keys of rows 2, 3, and 4, including five keys on the right side of the row 4, which correspond to N-M,-,-/-'-[-] on a standard keyboard.</p>
<p>30. A character input system using a keyboard comprising a plurality of keys, at least some of the keys each being assigned at least one Hindi script character, and at least one key being assigned a halant, the key assignments being spatially grouped on the keyboard according to the vowels and consonants, their phonetic characteristics and the method in which the characters are learned.</p>	<p>FIGS. 1 and 2 illustrate a keyboard comprising a plurality of keys. Some of the keys are assigned Hindi script characters. FIG. 2 illustrates a halant key (labeled "Halant"). The key assignments are illustrated as being spatially grouped according to the vowels and consonants, as described above, and their phonetic characteristics. The characters are also grouped according to the method in which the characters are learned.</p>
<p>31. A character input system using a keyboard comprising a plurality of keys, at least some of the keys each being assigned</p>	<p>FIG. 1 illustrates keys having full form Hindi script characters (e.g., one of the Varg characters shown). A halant key is</p>

at least one full form Hindi script character, and at least one key being assigned a halant, the key assignments being spatially grouped on the keyboard according to their phonetic characteristics, wherein a half-form of a character may be accessed by pressing a modifier key with a corresponding full form character key.	shown in FIG. 2. The key assignments are spatially grouped on the keyboard according to their phonetic characteristics. A half-form of a character may be accessed by pressing a modifier key, such as the "Shift" key, as shown in FIG. 2.
32. The character input system of claim 31 wherein the keyboard comprises a plurality of Hindi script vowel keys, each vowel key being assigned to a Hindi script vowel, and wherein a vowel sign (mantra) may be accessed by pressing a modifier key with a corresponding vowel key.	FIG. 1 shows Hindi script vowel keys arranged along row 1. FIG. 2 shows that the shifted keyboard includes vowel signs.
33. The character input system of claim 32 wherein the Hindi vowel keys are grouped on keys that are adjacent or diagonal to one another on the keyboard.	FIG. 1 shows Hindi script vowel keys arranged along row 1. These keys are adjacent to one another.
34. The character input system of claim 33 wherein at least some of the Hindi vowels are assigned to keys that correspond to the number-row on a standard keyboard.	FIG. 1 shows Hindi script vowel keys arranged along row 1. Row 1 corresponds to the number-row on a standard keyboard.



35. The character input system of claim 31 wherein the character input system comprises a standard keyboard.	FIG. 1 illustrates Hindi characters arranged on a standard keyboard.
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MPEP 715.07 identifies the general requirements of a Declaration Under 37 C.F.R. 1.131. "The affidavit or declaration must state FACTS and produce such documentary evidence and exhibits in support thereof as are available to show conception and completion of invention in this country or in a . . . WTO member country . . . at least the conception being at a date prior to the effective date of the reference. Where there has not been reduction to practice prior to the date of the reference, the applicant or patent owner must also show diligence in the completion of his or her invention from a time just prior to the date of the reference continuously up to the date of an actual reduction to practice or up to the date of filing his or her application (filing constitutes a constructive reduction to practice . . . ."

The enclosed Declaration states facts and provides such documentary evidence and exhibits to show conception of the invention in India (a WTO member country). As stated in the Declaration, conception occurred prior to the date of the reference. The present application was filed on January 3, 2002, which constitutes a constructive reduction to practice. The inventor acted with due diligence from a date prior to the date of the Laukkanen patent to the filing of the present patent application two weeks later.

For these reasons, the Declaration Under 37 C.F.R. 1.131 provides sufficient evidence to show invention of the claimed subject matter (as indicated above) prior to the effective date of the Laukkanen patent. Therefore, the Laukkanen patent is not prior art to at least those claims and the rejections of the claims under 35 U.S.C. § 102 and § 103 should be removed. Applicant reserves the right to file additional declarations in connection with all of the pending claims, as may be necessary.

If the Examiner determines that the enclosed Declaration Under 37 CFR 1.131 is deficient in any way, Applicant requests that such deficiency be specifically identified and that a detailed explanation be provided to assist Applicant in resolving such deficiency.

#### Claim Objection

Claim 29 was objected to. Applicant thanks the Examiner for noting this error. Claim 29 has been amended to replace the period with a semicolon, and to relocate the “and” to just prior to the last element of the claim. Therefore, removal of the objection to claim 29 is respectfully requested. Applicant notes that these amendments were not made to overcome an art-based rejection.

#### Double Patenting Rejection

Claims 1-3, 26, and 30-32 were provisionally rejected on the ground of nonstatutory obviousness-type double patenting over claims of Patent Application No. 10/875,344. Applicant traverses the rejection. A terminal disclaimer is enclosed that overcomes the provisional double patenting rejection. Therefore, withdrawal of the double patenting rejection is requested.

#### Claim Rejections under 35 U.S.C. § 102

Claims 1-4, 16-20, 26, and 30-31 were rejected under 35 U.S.C. § 102(e) as being anticipated by the Laukkanen patent (U.S. Patent No. 6,934,564). Applicant traverses the rejection. A Declaration Under 37 CFR 1.131 is enclosed with this Amendment and Response. As described above, the Declaration shows that the Laukkanen patent is not prior art to the claims identified above, including independent claims 1, 26, 29, 30, and 31. In addition, claims 17-20 depend from independent claim 1. Therefore, withdrawal of the § 102(e) rejection is requested.

Claim Rejection Under 35 U.S.C. § 103

Claims 5-9, 11-14, 27, 28, and 33-35 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Laukkanen in view of Weeks (U.S. Patent No. 5,880,685). Applicant traverses the rejection. A Declaration Under 37 CFR 1.131 is enclosed with this Amendment and Response. As described above, the Declaration shows that the Laukkanen patent is not prior art to claims 5-9, 11-14, and 33-35. Weeks, taken alone, fails to disclose or suggest all of the claim elements. For example, Weeks fails to disclose keys being assigned a Hindi script character. Claims 27 and 28 depend from claim 26. Therefore, withdrawal of the rejection of claims 5-9, 11-14, 27, 28, and 33-35 is requested.

Allowed Claims

The allowance of claims 21-25 is gratefully acknowledged.

Allowable Subject Matter

Claims 10 and 15 were indicated to be allowable if rewritten in independent form. With this Amendment and Response, claims 10 and 15 have not been amended because they are allowable in their present form. Specifically, claims 10 and 15 each depend from claim 1, which is allowable as discussed above. Therefore, claims 10 and 15 are also allowable.

Claim 29 was indicated to be allowable upon amendment to overcome the objection. Claim 29 has been amended to overcome the object, as described above. Therefore, claim 29 is allowable.

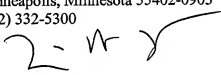
CONCLUSION

In view of the above amendments and remarks, Applicant respectfully requests a Notice of Allowance. There may be additional reasons that the pending subject matter is patentably distinct from the cited references in addition to those discussed herein. Applicant reserves the right to raise any such arguments in the future. If the Examiner believes a telephone conference would advance the prosecution of this application, the Examiner is invited to contact the undersigned at the below-listed telephone number.

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31 January 2008

  
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